

DAVID A. TORRES AND ASSOCIATES

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Attorney for:

ASHLEY WILLIAMS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT of CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.:16-CR-0049 LJO-SKO
)	
Plaintiff,)	AMENDED STIPULATION AND
)	PROPOSED ORDER TO CONTINUE
vs.)	THE STATUS CONFERENCE
)	
CONSTANCE TAYLOR)	
<u>ASHLEY WILLIAMS,</u>)	
)	
Defendant)	

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE SHEILA K. OBERTO AND VINCENZA RABENN, ASSISTANT UNITED STATES ATTORNEY:

COMES NOW Defendant, ASHLEY WILLIAMS, by and through her attorney of record, DAVID A. TORRES hereby requesting that the status conference hearing currently set for Tuesday, January 17, 2017 be continued to Tuesday, February 21, 2017.

I have spoken to AUSA Vincenza Rabenn and informed her that I am unavailable for the following reasons: I will be out of state and unavailable to appear at the scheduled hearing. I have received, read and reviewed all discovery with Ms. Williams and am prepared to engage in plea negotiations with AUSA Rabenn. I have emailed Mrs. Rabenn in regards to my intention to commence negotiations. I believe continuing the status to February 21, 2017 will allow counsel an opportunity to discuss a potential resolution. I have spoken to attorney Kevin Little and AUSA Rabenn, they have no objection to continuing this matter to February 21, 2017.

Stipulation and Proposed Order to Continue Sentencing

The parties also agree the delays resulting from the continuance shall be excluded in the interest of justice pursuant to 18 USC 3161 (h)(7)(A) and 3161 (h)(7)(B)(1) up to and including February 21, 2017.

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IT IS SO STIPULATED.

Respectfully Submitted,

DATED: 1/11/17

/s/ David A Torres

DAVID A. TORRES
Attorney for Defendant
ASHLEY WILLIAMS

DATED: 1/11/17

/s/ Kevin G. Little

KEVIN G. LITTLE
Attorney for Defendant
CONSTANCE TAYLOR

DATED: 1/11/17

/s/Vincenza Rabenn

VINCENZA RABENN
Assistant U.S. Attorney

ORDER

The parties' stipulated request for a continuance of the status conference date to February 21, 2017, is GRANTED to allow the parties additional time to achieve a mutually agreeable resolution of this matter. At the February 21, 2017 hearing, the parties shall be prepared to provide an update as to the status of their plea negotiations, and shall propose a timeline for advancing this case to trial if they are unable to resolve this case.

IT IS SO ORDERED.

Dated: January 12, 2017

/s/ Sheila K. Olerto
UNITED STATES MAGISTRATE JUDGE